



Blue Grass Chemical Agent-Destruction Pilot Plant

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Environmental Permitting: Resource Conservation and Recovery Act

The [Blue Grass Chemical Agent-Destruction Pilot Plant \(BGCAPP\)](#) is subject to the requirements of the Resource Conservation and Recovery Act (RCRA) and was required to obtain a RCRA permit before construction of the facility could begin. RCRA ensures the safe treatment, storage and disposal of hazardous waste generated nationwide.

What is a RCRA Permit?

A RCRA permit is a legally binding document that establishes the waste management activities a facility may conduct and the conditions under which it must operate. The permit outlines facility operations, lays out environmental performance requirements and describes activities that the facility must perform, such as monitoring and reporting. Permits typically require facilities to develop emergency plans and train employees to handle hazards. Permits also include facility-specific requirements based on the technologies employed. The permitting agency has the authority to issue or deny permits and is responsible for monitoring the facility to ensure it complies with the conditions in the permit. According to RCRA and its regulations, a treatment, storage and disposal facility (TSDF) may not operate without a permit, with rare exceptions.

The U.S. Environmental Protection Agency (EPA) enforces RCRA regulations to regulate the management of hazardous waste from generation until final treatment and/or disposal. This concept is often referred to as "Cradle to Grave." Several aspects of RCRA affect the pilot plant, specifically the standards for generators and TSDFs. The EPA delegated to the [Kentucky Department for Environmental Protection \(KDEP\)](#) the authority to implement RCRA and KDEP has developed the Kentucky Hazardous Waste Regulations, which closely parallel the federal RCRA regulations.

Permitting Process

The process of obtaining a permit is long and complex, with reviews and comments on the permit application by both EPA and KDEP. BGCAPP obtained its RCRA permit from KDEP on Sept. 30, 2005. Public participation was required throughout the process.

The [Blue Grass Army Depot \(BGAD\)](#) commander is responsible for complying with environmental laws and regulations during any operations occurring on the depot and also signs as the owner on the permit. As such, all issues and actions related to the permit, including correspondence, applications and modifications, are coordinated with the BGAD Environmental Office.

Treatment, Storage and Disposal Facilities

Facilities that treat, store or dispose of hazardous waste must first obtain a RCRA permit. RCRA requires these facilities to manage hazardous waste in a manner fully protective of human health and the environment. Since BGCAPP will treat and store hazardous waste, a RCRA permit is required for all hazardous waste management activities at BGCAPP, including both storage and treatment.

Generators

Generators of hazardous waste must comply with standards for storage, waste tracking, labeling, record keeping and reporting. BGCAPP will generate hazardous waste as a result of operations.

These wastes include spent charcoal filters, salts and used personal protective equipment.

BGAD, as the owner (applicant), and Bechtel Parsons Blue Grass (BPBG) as the operator (applicant), were required to submit a RCRA application to KDEP for a Research, Development and Demonstration (RD&D) permit to build and operate the full-scale pilot plant. The RD&D permit allows BGAD and BPBG to build and test the pilot plant.

BGAD and BPBG submitted a detailed permit application describing how BGCAPP would be built and operated to comply with RCRA regulations. Prior to submitting the permit application, the applicants held a pre-application meeting to inform the public of their intent to submit a RCRA permit application and to obtain public comments. KDEP then reviewed the application, requested additional information and clarification as needed, developed draft permit conditions and issued a draft permit for public comment. During this comment period, both public meetings and a public hearing occurred. After comments were received and incorporated, a final BGCAPP RCRA RD&D permit was issued.

Although the plant consists of proven processes and components, the National Academies of Sciences, Engineering, and Medicine (formerly known as the National Research Council) recommended that the integrated plant be tested under an RD&D program before full operations begin. The RD&D approach was recommended to provide maximum safety for the workforce and the public, and KDEP permitted BGCAPP initial GB operations under a RCRA RD&D permit. The plant will perform VX operations under the authority of a Part B hazardous waste management permit.

Public Participation

Public participation is a vital component of the permitting process. Members of the public can contribute valuable information and ideas that improve the quality of both agency decisions and permit applications. The public is encouraged to ask questions and provide input throughout the entire permitting process. Questions may be left with the [Blue Grass Chemical Stockpile Outreach Office](#) at bgoutreach@iem.com or by calling (859) 626-8944.